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E

The significant adverse cumulative impacts caused by reasonably foreseeable increased water supply diversions (American River Basin Cumulative Impact Report, Appendix D) is of considerable concern. Furthermore, it is clear there is the potential for significant water scarcity and the need for long-term strategies to address future shortages. EPA firmly believes that long-term water supply commitments must focus on determination of available supplies and bringing commitments into alignment with these supplies. Thus, we support the American River Water Forum's efforts to determine the basin wide water supply demand and to balance this demand with existing water supplies while protecting and enhancing the natural resources of the Lower American River. Of special note are the Water Forum's Dry Year Agreements (pg. 2-25).

We urge the Bureau, PCWA, and Water Forum to utilize a broad array of tools to increase management flexibility, water supply reliability, and to assure a long-term, sustainable balance between available water supplies, ecosystem health (e.g., in-stream beneficial uses, water quality), and water supply demand (e.g., contract commitments). These tools could include water transfers and exchanges, conservation, pricing, irrigation efficiencies, operational flexibilities, market-based incentives, diversification of water supply sources, water acquisition, conjunctive use, voluntary temporary or permanent land fallowing, water quality improvements, and wastewater reclamation and recycling.

F

EPA also has concerns regarding air quality. Because of these concerns, we have classified this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating System"). Additional detailed comments are enclosed. We appreciate the opportunity to review this DEIS. Please send two copies of the FEIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions or wish to discuss our comments, please call Ms. Laura Fujii, of my staff, at (415) 972-3852

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

Enclosure: Detailed Comments (4 pages)
Summary of the EPA Rating System
MI003284
Filename: pcwapumpdeis.wpd

cc: Jim White, Department of Fish and Game
Wayne White, US Fish and Wildlife Service
Gary Stern, National Marine Fisheries Service
US Corps of Engineers, Sacramento
Brent Smith, PCWA

E. Many of the tools and programs suggested by the commenter have been and continue to be considered, developed, and implemented through regional and combined state/federal program efforts, such as the Sacramento Area Water Forum and CALFED. As participants in these larger programs, PCWA and Reclamation fully support the development and implementation of efforts to improve the balance between water supply and environmental resource water needs.

F. Additional detailed comments are addressed below, including specific references to Chapter 3.0 of the Final EIS/EIR, which provide additional clarification and information. Please refer to Responses L-121.G through L-121.P.

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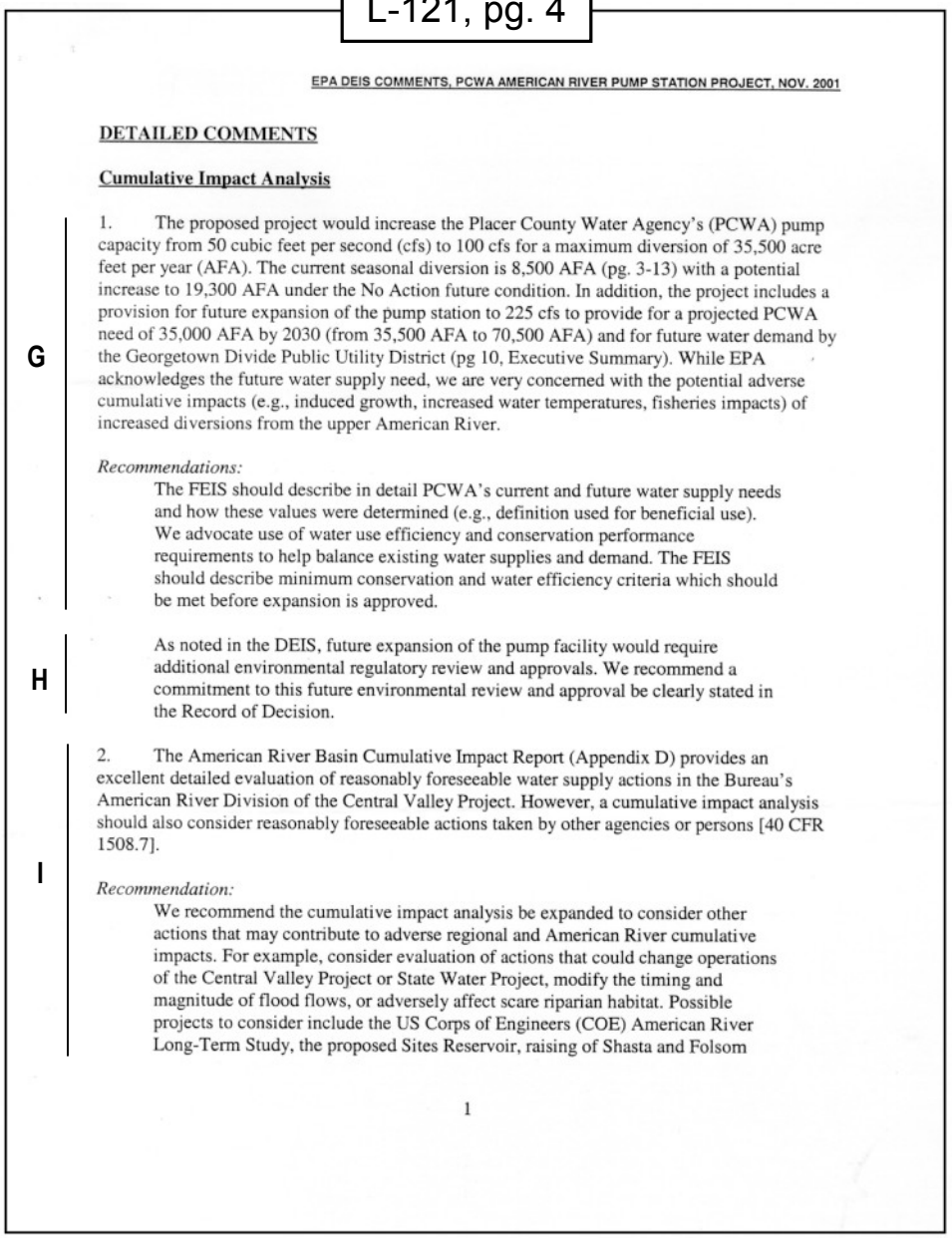

EPA DEIS COMMENTS, PCWA AMERICAN RIVER PUMP STATION PROJECT, NOV. 2001

DETAILED COMMENTS

Cumulative Impact Analysis

1. The proposed project would increase the Placer County Water Agency's (PCWA) pump capacity from 50 cubic feet per second (cfs) to 100 cfs for a maximum diversion of 35,500 acre feet per year (AFA). The current seasonal diversion is 8,500 AFA (pg. 3-13) with a potential increase to 19,300 AFA under the No Action future condition. In addition, the project includes a provision for future expansion of the pump station to 225 cfs to provide for a projected PCWA need of 35,000 AFA by 2030 (from 35,500 AFA to 70,500 AFA) and for future water demand by the Georgetown Divide Public Utility District (pg 10, Executive Summary). While EPA acknowledges the future water supply need, we are very concerned with the potential adverse cumulative impacts (e.g., induced growth, increased water temperatures, fisheries impacts) of increased diversions from the upper American River.

G

Recommendations:

The FEIS should describe in detail PCWA's current and future water supply needs and how these values were determined (e.g., definition used for beneficial use). We advocate use of water use efficiency and conservation performance requirements to help balance existing water supplies and demand. The FEIS should describe minimum conservation and water efficiency criteria which should be met before expansion is approved.

H

As noted in the DEIS, future expansion of the pump facility would require additional environmental regulatory review and approvals. We recommend a commitment to this future environmental review and approval be clearly stated in the Record of Decision.

2. The American River Basin Cumulative Impact Report (Appendix D) provides an excellent detailed evaluation of reasonably foreseeable water supply actions in the Bureau's American River Division of the Central Valley Project. However, a cumulative impact analysis should also consider reasonably foreseeable actions taken by other agencies or persons [40 CFR 1508.7].

I

Recommendation:

We recommend the cumulative impact analysis be expanded to consider other actions that may contribute to adverse regional and American River cumulative impacts. For example, consider evaluation of actions that could change operations of the Central Valley Project or State Water Project, modify the timing and magnitude of flood flows, or adversely affect scare riparian habitat. Possible projects to consider include the US Corps of Engineers (COE) American River Long-Term Study, the proposed Sites Reservoir, raising of Shasta and Folsom

1

G. The Draft EIS/EIR provides a summary of PCWA's estimated future water supply needs (pages 1-5 through 1-7) as determined through long-term planning projections supported by projections in the general and specific plans of Placer County and the cities or communities within PCWA's water service area (see also Draft EIS/EIR pages 3-30 to 3-31). Draft EIS/EIR Table 3.4-2 provides a summary of incremental water supply demand increases projected through 2020.

Please also refer to Master Response 3.1.11, PCWA's Water Conservation Program.

H. The Draft EIS/EIR indicates the requirement to complete future environmental review and approval prior to expansion of the pump station (Chapter 2.0, Description of Alternatives, page 2-27). The lead agencies would not legally be able to expand the American River Pump Station without completing all appropriate environmental review and regulatory permitting processes, including public notification and involvement opportunities. Additionally, PCWA would only consider expansion of the pump station in the event the Sacramento River Diversion Project does not materialize.

I. The American River Basin Cumulative Report includes all reasonably foreseeable projects or actions that would potentially contribute to cumulative impacts, not just Reclamation's actions. Please refer to Appendix E of the Cumulative Report.

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Dams, implementation of the Trinity River restoration flow decision, COE Sacramento-San Joaquin Comprehensive Study, and CALFED restoration projects.

3. Potential mitigation measures to address cumulative impacts are only briefly mentioned in the DEIS and American River Basin Cumulative Impact Report.

J

Recommendations:

The cumulative impact analysis should include a distinct section providing a description and discussion of actions that can be implemented to help reduce identified potential adverse cumulative impacts. This section could be included after each resource environmental analysis section (e.g., water quality, fisheries) or as a separate section devoted to mitigation. While we recognize that the Bureau and PCWA are not responsible for the mitigation of cumulative impacts caused by other actions, we believe a general description of possible mitigation measures for cumulative impacts encourages others to step forward and take actions to reduce these impacts.

Possible mitigation measures to consider are water supply demand management tools, wetland and riparian habitat restoration, threatened and endangered species recovery actions, development of resource management plans (e.g., habitat conservation plans, natural community conservation plans), watershed analysis projects, implementation of Water Forum actions and agreements, implementation of nonpoint source pollution controls, implementation of sustainable growth principles (e.g., town-centered, transit and pedestrian oriented development), and active participation in CALFED efforts.

4. While we believe the American River Basin Cumulative Impact Report is an excellent attempt at providing a watershed-level cumulative impacts analysis, there a number of additional features which may improve the usefulness of the document.

K

Recommendations:

We suggest the following items be considered for inclusion in the Report:

a. An acronym definition list.

b. An executive summary providing a short summary of cumulative impacts and their causes.

c. A summary table of the reasonably foreseeable American River diversions. This table should include information on the American River's safe water supply yield and for each diversion - current and projected water supply demand, current and future contract amounts, water rights, and safe yield of other utilized water supply sources (e.g., groundwater, Central Valley Project, State Water Project).

J. Appendix A, Conservation Measures, of the American River Basin Cumulative Report, provides a list of ongoing or planned environmental resource protection or enhancement programs of local and regional agencies within the American River Basin. Specific on-going and future programs involving PCWA or Reclamation also are listed in Section 5.0 of the Mitigation Plan (Appendix D of the Final EIS/EIR). Conservation measures being implemented within the study area include many of those listed by the commenter.

K. An updated acronym and abbreviations list is provided at the front of the Final EIS/EIR. The cumulative impacts are identified in the Summary of Impacts and Environmental Protection and Mitigation Measures, as revised and presented in Chapter 2.0 of the Final EIS/EIR. Available information regarding each of Reclamation's reasonably foreseeable American River actions is provided in Chapter 2.0 of the American River Basin Cumulative Report and in the technical modeling memorandum. These modifications do not alter the conclusions presented in the Draft EIS/EIR, including the Cumulative Report.

L. The Draft EIS/EIR, page 2-296, recognizes that the Proposed Project study area is within a non-attainment area for ozone and particulate matter (PM_{10}). However, based on the implementation of recommended air pollutant control measures identified in the Draft EIS/EIR, it has been determined through consultation with the local air pollution control districts that the Proposed Project would be in conformity with the implementation plan and would not be expected to cause or contribute to any new violations or increase the frequency or severity of any existing violation of any standards. Information regarding the Proposed Project's conformity with the implementation plan, according to the General Conformity Regulations, is provided in Chapter 3.0, Section 3.15, Air Quality of the Final EIS/EIR. This change does not alter the conclusions presented in the Draft EIS/EIR.

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EPA DEIS COMMENTS, PCWA AMERICAN RIVER PUMP STATION PROJECT, NOV. 2001

K (cont)

d. A summary table for regional diversion projects. This table would be similar to the one above for American River diversions and should include information on the safe yield of utilized water sources (e.g., annual flows of Sacramento and American River tributaries, reservoir storage capacities), current and future diversion quantities, and current and projected demand.
While we recognize that much of the above data is present in the text, we believe summary tables would provide a quick glimpse of the data and an overview of the diversions from each major watershed.

Air Quality Analysis

L

1. While the DEIS provides an evaluation of potential air quality impacts, it does not appear to include a general conformity evaluation. Federal agencies are required by the Clean Air Act to assure that actions conform to an approved air quality implementation plan.

Recommendation:

If the proposed project area is in a nonattainment area, the Bureau may need to demonstrate compliance with conformity requirements of the Clean Air Act [Section 176(c)]. General Conformity Regulations can be found in 40 CFR Parts 51 and 93 (58 Federal Register, page 63214, November 30, 1993). These regulations should be examined for applicability to the proposed action. If the general conformity requirement does not apply to the proposed action (e.g., the project is in an attainment area), than the FEIS should state this.

M

2. EPA issued revised standards for ozone and small particulate matter (PM2.5)(smog and soot) in July 1997. Implementation of these standards are pending the designation of nonattainment areas and development of specific regulatory requirements. The adverse health effects of ozone and PM2.5 are well known. Thus, we believe the FEIS should evaluate the extent that the proposed project may release significant amounts of these pollutants.

Recommendations:

We recommend the Air Quality section of the "Affected Environment" chapter, include a description of the new ozone and PM2.5 standards, their health effects, and disclose what, if any, monitoring has been done in the project area for these pollutants. Possible sources that may contribute to high levels of ozone and PM2.5 emissions include construction equipment, mobile sources, and high volumes of diesel truck traffic.

The FEIS should identify sensitive receptors. These include children (schools, preschools, parks, playgrounds), elderly (retirement homes), infirm (hospitals), and athletes (gymnasiums, tracks, pools).

3

M. The Draft EIS/EIR evaluates the potential impacts associated with emission of ozone precursors (ROG and NO_x) and of PM_{10} according to the available emission estimate calculations and requirements of the local air pollution control districts. While it is recognized that EPA has issued standards for small particulate matter ($PM_{2.5}$), monitoring data for this pollutant was not available for locations within the study area at the time of Draft EIS/EIR preparation. It is expected that $PM_{2.5}$ will begin to be collected at Placer County air monitoring stations within the next year (D. Vintze January 2002). The mitigation measures included for PM_{10} were developed in consultation with the local air pollution control districts and are considered appropriate and adequate to mitigate the potential construction-related fugitive dust emissions of the project. Information regarding the new ozone and $PM_{2.5}$ standards, their health effects, and the status of monitoring and evaluation of these pollutants in the project area is provided in Chapter 3.0, Section 3.15.12, Regional Setting, Air Pollutants of Concern. This change does not alter the conclusions presented in the Draft EIS/EIR.

The Draft EIS/EIR identifies receptors that may be sensitive to air pollutant emissions generated by the Proposed Project (page 3-296). These receptors were identified in consultation with the Placer and El Dorado County air pollution control districts and are the focus of the air quality impact evaluation.

Mitigation measures identified to minimize ozone and particulate matter generation have been identified in consultation with the Placer County Air Pollution Control District (PCAPCD). The El Dorado County Air Pollution Control District also was consulted during preparation of the Draft EIS/EIR evaluation and during completion of the Final EIS/EIR. However, because no sensitive receptors were identified within the accepted sensitive receptor distance (1,000 feet in El Dorado County), the focus of the air quality analysis is on the Placer County side of the project study area.

The Draft EIS/EIR provides mitigation for potential air quality impacts to the maximum extent possible, as determined through consultation with local air pollution control districts. Mitigation measures for the construction-related air quality emission impacts are presented in the Draft EIS/EIR Summary of Environmental Protection and Mitigation Measures (Chapter 2.0, Section 2.3, pages 2-39 through 2-41) and in the Air Quality Analysis (Chapter 3.0, Section 3.15.2, pages 3-298 through 3-307). These measures include those mitigation approaches recommended by the commenter. Additionally, the lead agencies considered purchase of NO_x emission credits, but were advised during discussions with PCAPCD held during preparation of the Draft EIS/EIR, that the purchase of NO_x emission credits was not a feasible or appropriate mitigation measure for this project. Instead, PCAPCD recommended the measures included in the Draft EIS/EIR (page 3-300, 3-301), including an ongoing adaptive approach involving weekly construction air pollutant emission monitoring and evaluation of conditions throughout the construction period. These measures are considered adequate and appropriate for the mitigation of potential impacts and would be expected to fully mitigate NO_x emissions below the PCAPCD quarterly threshold. However, because there remains some uncertainty that NO_x emissions would consistently remain below the quarterly threshold, the Draft EIS/EIR indicates a conservative impact call regarding the potential for a short-term exceedance.

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M (cont) We also encourage mitigation to the maximum extent possible. Mitigation measures may include air emission credits, keeping diesel engines well tuned, retrofitting diesel engines, using machinery that uses alternative fuels, scheduling construction to minimize impacts to sensitive receptors, implementing seasonal control programs, and investigating opportunities to minimize land clearing. Given the potential for violation of nitrogen oxide (NOx) thresholds, we strongly recommend that the FEIS explore the possibility of purchasing NOx credits.

General Comments

N 1. The potential for climate change is now considered a significant possibility. Current research estimates that climate change could modify the frequency, magnitude, and timing of precipitation in the pacific northwest. A major change in precipitation and weather patterns could have notable implications for how we manage our water supply facilities.

Recommendation:

We recommend the FEIS include a short section on climate change and its potential implications for water supply management within the American River Basin and California. If possible, describe the potential impacts of future climate change on the effectiveness of the proposed PCWA pump facility (e.g., is the proposed location high enough), model assumptions and results (e.g., PROSIM), operation of the CVP and SWP, and potential impacts to resources of concern (e.g., fisheries).

O 2. Effective and sustainable management of CVP water supplies depends on an accurate knowledge of water supply availability and water use. This knowledge can only be obtained through monitoring and accounting of water supply and demand. We urge the Bureau and PCWA to make a firm commitment to timely and accurate monitoring and accounting. This commitment should include dedicated funding for this effort.

P 3. To provide clarity we recommend the FEIS include a major features figure for the No Action Alternative similar to those for the action alternatives. This figure should include the exact location of the seasonal pump facility, diversion/intake location, discharge pipe, and road access.

Q 4. If feasible, we recommend providing an itemized cost description which breaks out the cost for the pump facility, closure of the bypass tunnel, and river restoration actions.

4

N. Information regarding climate change is provided in Chapter 3.0, Section 3.18, Other Impact Considerations, which has been revised to include Section 3.18.6, Climate Change. This change does not alter the conclusions presented in the Draft EIS/EIR.

O. Reclamation presently monitors water deliveries and reports results annually in the Water Use Report required under Section 3405(B) of the CVPIA. PCWA monitors and records water supply diversions and deliveries associated with operation of the Middle Fork Project. This information is utilized by the individual agencies in their long-term water supply planning efforts.

P. The commenter requests a figure depicting the major features of the No Action Alternative. A figure showing the No Action/No Alternative has been included in Chapter 2.0, Section 2.2.1, No Action/No Project Alternative. This additional information does not alter the conclusions presented in the Draft EIS/EIR.

Q. A description of the costs of major project elements has been developed in response to this and other comments. An estimated cost breakdown of the Proposed Project has been included in Chapter 2.0, Section 2.2.2, Proposed Project—Mid-Channel Diversion Alternative of the Final EIS/EIR. This change does not alter the conclusions presented in the EIS/EIR.

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SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

ADEQUACY OF THE IMPACT STATEMENT

Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

L-122

Dennis Hada, 01:53 PM 11/13/01, Auburn Dam Site Restoration

From: Dennis Hada <dennis.hada@mcsinet.com>
To: ""brown@swri.net"" <brown@swri.net>
Subject: Auburn Dam Site Restoration
Date: Tue, 13 Nov 2001 13:53:19 -0500
Importance: high
X-Mailer: Internet Mail Service (5.5.2653.19)

November 13, 2001

American River Pump Station Project
Draft EIS/EIR Comments
Surface Water Resources, Inc.
2031 Howe Ave. Suite 110
Sacramento, CA 95825

To Whom It May Concern:

I am in support of restoring the American River at the Auburn Dam Construction site to it's natural flow, however, I am concerned about the loss of the Auburn to Cool trail as a result of this closure. The Auburn to Cool trail, via the diversion tunnel, has provided the only safe route for mountain bicyclists to get between the 2 towns. The only other route requires riding on at least 2 miles of hwy. 49 that has no shoulders and high traffic speeds.

My understanding is that the proposed design for a bridge at the restoration site has been estimated in excess of one million dollars. I believe that a better lower cost alternative would be a new trail that goes from the dam overlook to either hwy. 49 at the river or Mt. Quarries bridge and then up to Cool. The route on the Auburn side is already in place, as well as the Mt. Quarries bridge. The cost to complete this alternative is approximately one fifth that of erecting a new bridge at the tunnel location.

A I trust that mitigation for closing the existing trail would include all or partial funding for such a trail.

The completion of the pump station project will result in more people using the park. Additional long term funds are needed to manage the park as the number of visitors increase. Some funding source should be identified to do this.

Thank you for your time and feel free to contact me if you have any questions regarding this issue.

Dennis Hada

*Vice President, **ARMBA** (American River Mountain Bike Assistants)*
*Member, **FATRAC** (Folsom / Auburn Trail Riders Action Coalition)*
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wk FAX; (916) 414-2131

A. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.